

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA    )  
  )  
vs.                                    ) NO. 04-CR-30055-MAP  
  )  
KACEY JONES                        )

MOTION FOR FUNDS

Now comes the defendant and respectfully requests this Honorable Court allow him to expend an amount not to exceed \$2,000.00 to retain Dr. Howard Lester for purposes of conducting a mental health evaluation and/or consulting with defense regarding mental health issues which may be affecting the defendant.

As grounds for this request the defendant states he was provided with discovery on 12/7/05 by the Government which indicated the defendant may have mental health issues. Specifically, the documents provided relate to an event which occurred in March '05 while the defendant was incarcerated at the Hampden County House of Correction. The details of the event include the defendant being found in his cell causing harm to himself and indicating he was hearing voices. The defendant was moved to the medical unit/forensic department at the facility which may have conducted an evaluation on the defendant.

Counsel for the defendant had no indication of any mental health issues prior to being given this information by the Government. Counsel is requesting funds in order to consult with a doctor regarding this matter and review any reports that may have been prepared by any facility the defendant may have been held in.

DEFENDANT

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